

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

PENNSYLVANIA NATIONAL	•
MUTUAL INSURANCE	
COMPANY,	
Plaintiff,	CASE NUMBER 08-J-0635-S
<b>v.</b>	
HANNA STEEL CORPORATION,	
CEOLA ALLEN, KATIE	
LOWERY, LARRY AARON,	
COLUMBIA CASUALTY	
COMPANY, NATIONAL FIRE	
INSURANCE COMPANY OF	
HARTFORD, FIREMAN'S FUND	
INSURANCE COMPANY,	
AMERICAN MANUFACTURERS	
MUTUAL INSURANCE	
COMPANY,	
Defendants.	

## FIREMAN'S FUND INSURANCE COMPANY'S EVIDENTIARY SUBMISSION IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT

Come now defendant Fireman's Fund Insurance Company and submits the following evidence in support of its Motion for Summary Judgment filed concurrently herewith:

Exhibit A: Complaint, Pennsylvania National Mutual Ins. Co. v. Hanna Steel Corporation, et al., Case No.: 08-J-0635-S.

## Exhibit B:

- Exhibit C: Complaint, Ceola Allen, et al. v. Hanna Steel Corp., et al., Civ. No. 04-79, Circuit Court of Jefferson County, Alabama.
- Exhibit D: Complaint, *Katie Lowery, et al. v. Hanna Steel Corp., et al.*, Civ. No. 05-1749, Circuit Court of Jefferson County, Alabama.
- Exhibit E: Complaint, Larry Aaron, et al. v. Hanna Steel Corp., et al., Civ. No. 07-40, Circuit Court of Jefferson County, Alabama.
- Exhibit F: March 8, 2004 letter from Fireman's Fund Insurance Company to Hanna Steel Corporation.
- Exhibit G: June 5, 2007 letter from Fireman's Fund Insurance Company to Hanna Steel Corporation.
- Exhibit H: August 28, 2007 letter from Fireman's Fund Insurance Company to Hanna Steel Corporation.

Dated: September 18, 2008

By: /S/
Sharon Stuart (DON015)
Lynn S. Darty (DAR010)
CHRISTIAN & SMALL LLP
1800 Financial Center
505 North Twentieth Street
Birmingham, AL 35203-2696
(205) 795-6588
(205) 328-7234 (fax)

Gary D. Centola (admitted pro hac vice) William J. Edwins (admitted pro hac vice) Rivkin Radler LLP 926 RexCorp Plaza Uniondale, NY 11556-0926 (516) 357-3000 (516) 357-3333 (fax)

Attorneys for Defendant Fireman's Fund Insurance Company